

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:  
All Actions

**AFFIDAVIT OF KELLY C. DOHM  
IN OPPOSITION TO 3M  
COMPANY'S MOTION TO  
REMOVE "CONFIDENTIAL"  
DESIGNATION FROM  
DOCUMENTS PRODUCED BY  
RIDGEVIEW MEDICAL CENTER**

**(FILED UNDER SEAL)**

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Kelly C. Dohm, being duly sworn, deposes and declares:

1. I am one of the attorneys representing Ridgeview Medical Center in connection to the above-referenced matter. I make this Affidavit in opposition to 3M Company's Motion to Remove "Confidential" Designation from Documents Produced by Ridgeview Medical Center.
2. Attached hereto and marked as **Exhibit A** is a summary chart that describes the documents at issue in 3M's motion.
3. Attached hereto and marked as **Exhibit B** is 3M Company's subpoena to Ridgeview Medical Center that is the subject of the motion.
4. Attached hereto and marked as **Exhibit C** is correspondences between Micah Hines, counsel for 3M Company, and your Affiant regarding Ridgeview Medical Center's response to the subpoena.

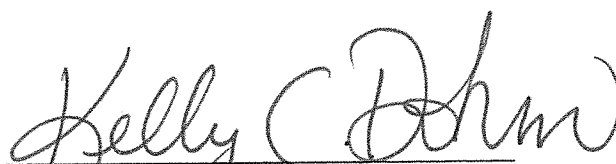
5. Attached hereto and marked as **Exhibit D** is Ridgeview Medical Center's Responses to the subpoenaed documents and cover letter enclosing the responsive documents.

6. Attached hereto and marked as **Exhibit E** is e-mail correspondences between your Affiant and Ms. Micah Hines addressing issues involving the subpoenaed documents prior to the filing of 3M Company's motion for de-designation.

FURTHER YOUR AFFIANT SAYETH NOT.

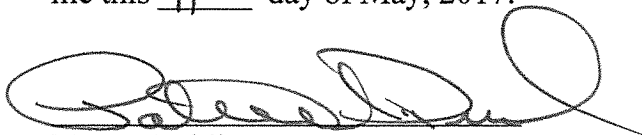
Date: May 11, 2017

By:



Kelly C. Dohm (#0254046)  
MELCHERT HUBERT SJODIN, PLLP  
121 West Main Street, Suite 200  
Waconia, MN 55387  
Phone: (952) 442-7700  
Fax: (952) 442-6166  
Email: [kdohm@mhsllaw.com](mailto:kdohm@mhsllaw.com)

Subscribed and sworn to before  
me this 11 day of May, 2017.



Notary Public

